

Exhibit 11

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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION

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4 Philip Wong, Frederic Chaussy,
and Leslie Marie Shearn, individually,
5 on behalf of all others similarly
situated, and on behalf of the
6 general public,

7 Plaintiffs,

8 vs. Case No.
C 07 2446 MMC [ECF]

9

HSBC Mortgage Corporation (USA);
10 HSBC Bank USA, N.A.; and DOES 1
through 50, inclusive,

11

Defendants.

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15 VIDEOTAPED DEPOSITION OF FREDERIC CHAUSSEY

16 San Francisco, California

17 Thursday, March 13, 2008

18 Volume 1

19

20

21 Reported by:
CHRIS TE SELLE
22 RPR, CSR No. 10836

23 Job No. 3-83065

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16 Videotaped deposition of FREDERIC CHAUSSY,
17 volume 1, taken on behalf of Defendants, at the
18 offices of Littler Mendelson, 650 California
19 Street, San Francisco, California, beginning at
20 10:14 a.m. and ending at 4:22 p.m., on
21 Thursday, March 13, 2008, before CHRIS
22 TE SELLE, RPR, Certified Shorthand Reporter
23 No. 10836.

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00117

1 Q. But that was something you suggested might
2 be useful; is that right?

3 A. Yeah, like a newsletter would have been
4 useful.

5 Q. Okay.

6 When you did, when you mailed out
7 marketing materials, were these marketing materials
8 that you helped prepare, or were these marketing
9 materials someone else prepared?

10 A. Someone else prepared.

11 Q. Did you provide any input into the
12 development of those?

13 A. No, I did not.

14 Q. I notice that you mentioned that from time
15 to time that you would give small gifts to what you
16 referred to as influential people might be helpful.

17 Did you ever give prospective customers,
18 or, quote, influential people, unquote, wine?

19 A. No, not when I was working at HSBC. The
20 only thing that I did is just take clients, from
21 time to time, to lunch, as listed in my --

22 Q. Okay, fair enough.

23 A. -- reports.

24 Q. I notice on page 5, Bates stamped 57, you
25 list a number of real estate companies from which

00208

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:
4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were duly sworn; that a record
8 of the proceedings was made by me using machine
9 shorthand which was thereafter transcribed under my
10 direction; that the foregoing transcript is a true
11 record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal
14 Case, before completion of the proceedings, review
15 of the transcript [] was [] was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee
18 of any attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date
20 subscribed my name.

21

22 Dated: _____

23

24

CHRIS TE SELLE
CSR No. 10836

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